UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to: Schenevus Central School District

Management Order No 8.

LOCAL GOVERNMENT AND SCHOOL DISTRICT MASTER SHORT-FORM COMPLAINT AND DEMAND FOR JURY TRIAL

Member Case No.: 3:24-cv-08173

The Plaintiff(s) named below file(s) this Short-Form Complaint and Demand for Jury Trial against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in Plaintiffs' Master Local Government and School District Complaint ("Master Complaint") as it relates to the named Defendant(s) (checked-off below), filed in In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, MDL No. 3047, in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this Short-Form Complaint as permitted by Case

Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of Actions specific to Plaintiff(s)' case.

Plaintiff(s), by and through their undersigned counsel, allege(s) as follows: 1 **DESIGNATED FORUM** I. 2 1. For Direct Filed Cases: Identify the Federal District Court in which the Plaintiff(s) would have filed in the absence of direct filing: 3 United States District Court for the Northern District of New York 4 5 6 7 2. For Transferred Cases: Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing: 8 N/A 9 10 11 12 II. **IDENTIFICATION OF PARTIES** 13 Α. PLAINTIFF(S) 14 3. Plaintiff(s): Name(s) of the local government or school district alleging claims against Defendant(s): 15 Schenevus Central School District 16 17 4. Number of schools served in the Plaintiff(s)' school district or local community: 18 Approximately 1 school 19 20 5. Number of minors served in the Plaintiff(s)' school district or local community: 21 Plaintiff currently enrolls approximately 287 students 22 23 6. At the time of the filing of this Short-Form Complaint, Plaintiff(s) is/are a resident and citizen of [Indicate State]: 24 New York 25 26 27

28

B. <u>DEFENDANT(S)</u>

7. Plaintiff(s) name(s) the following Defendant(s) in this action [Check all that apply]:

META ENTITIES

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

▼ META PLATFORMS, INC.,

formerly known as Facebook, Inc.

INSTAGRAM, LLC

X FACEBOOK PAYMENTS, INC.

SICULUS, INC.

X FACEBOOK OPERATIONS, LLC

X FACEBOOK HOLDINGS, LLC

META PAYMENTS INC.

TIKTOK ENTITIES

X BYTEDANCE LTD

X BYTEDANCE INC.

TIKTOK LTD

TIKTOK LLC

TIKTOK INC.

SNAP ENTITY

SNAP, INC.

GOOGLE ENTITIES

GOOGLE, LLC

YOUTUBE, LLC

OTHER DEFENDANTS

For each "Other Defendant" Plaintiff(s) contends are additional parties and are liable or responsible for Plaintiff(s)' damages alleged herein, Plaintiff(s) must identify by name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts supporting any claim against each "Other Defendant" in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

NAME	CITIZENSHIP

5

8

10

20

28

CAUSES OF ACTION ASSERTED

8. The following Causes of Action asserted in the *Master Complaint*, and the allegations with regard thereto, are adopted in this Short-Form Complaint by reference (check all *that are adopted*):

Asserted Against ¹	Count Number	Cause of Action (COA)
Meta entities	1	NEGLIGENCE
X Snap		
X TikTok entities		
X Google entities		
\square Other Defendant(s) ²		
Meta entities	2	PUBLIC NUISANCE
X Snap		
X TikTok entities		
X Google entities		
Other Defendant(s)		

NOTE

If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph 8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those additional Cause(s) of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this Short-Form Complaint.

IV. ADDITIONAL CAUSES OF ACTION

9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting allegations against the following Defendants:

¹ For purposes of this paragraph, "entity" means those Defendants identified in Paragraph 7 (e.g., "TikTok entities" means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

² Reference selected "Other Defendants" by the corresponding row number in the "Other Defendant(s)" chart identified in Paragraph 7.

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants and all such further relief that this Court deems equitable and just as set forth in the *Master Complaint*, and any additional relief to which Plaintiff(s) may be entitled.

JURY DEMAND

Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority and jurisdiction of the United States District Court of the Northern District of California and oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as necessary through sanctions and/or revocation of *pro hac vice* status.

/S/ Austin Brane

Name: Austin Brane

Firm: Wagstaff & Cartmell LLP

Address: 4740 Grand Ave., Ste. 300, Kansas City, MO 64112

Phone: (816) 701-1100

Fax: (816) 531-2372

Email: abrane@wcllp.com

Attorneys for Plaintiff(s)

Schenevus Central School District